

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

STATE OF CALIFORNIA, et al.,

Plaintiffs,

v.

U.S. DEPARTMENT OF
TRANSPORTATION, et al.,

Defendants.

Civil Action No.
25-cv-000208-JJM-PAS

**DEFENDANTS' OPPOSITION TO PLAINTIFFS'
MOTION TO MODIFY PRELIMINARY INJUNCTION**

On June 19, 2025, this Court entered a preliminary injunction (ECF No. 57) against Defendants as to the twenty Plaintiff States that had signed onto the original Complaint, filed on May 13, 2025 (ECF No. 1), and Motion for Preliminary Injunction, filed on May 22, 2025 (ECF No. 41). On July 8, 2025, Plaintiffs filed an Amended Complaint (ECF No. 61) to add two new plaintiffs: the District of Columbia and the Kentucky Governor's Office.

On July 10, 2025, Plaintiffs moved to extend the scope of the Court's existing preliminary injunction to include the two new plaintiffs. ECF No. 62. Plaintiffs aver that the Amended Complaint "otherwise does not make any substantive changes to Plaintiff States' allegations, claims, or the factual bases for their claims." *Id.* at 2. The District of Columbia and the Kentucky Governor's Office had the opportunity to join the lawsuit earlier but failed to do so. These new plaintiffs now attempt to benefit from the existing preliminary injunction without having to

litigate the alleged issues. For the reasons stated in Defendants' Opposition to Plaintiffs' Motion for Preliminary Injunction (ECF No. 51), Defendants oppose Plaintiffs' motion to extend the preliminary injunction to include the two new plaintiffs. The Court should decline to modify its existing preliminary injunction.

Dated: July 16, 2025

Respectfully submitted,

U.S. DEPARTMENT OF
TRANSPORTATION, et al
By their Attorneys,

/s/ Sara Miron Bloom

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CERTIFICATION OF SERVICE

I hereby certify that, on July 16, 2025, I filed the foregoing document through this Court's Electronic Case Filing (ECF) system, thereby serving it upon all registered users in accordance with Federal Rule of Civil Procedure 5(b)(2)(E) and Local Rules Gen 304.

/s/ Sara Miron Bloom

Acting United States Attorney